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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

LAWRENCE JAMES SACCATO,

Plaintiff,

v.

DAVIS LAW FIRM; DKC INVESTMENTS
LLC a/s/o; FIRST NATIONAL BANK OF
OMAHA,

Defendants.

Case No. CV-10-6192 HO

**DECLARATION OF ROBERT E.
SABIDO IN SUPPORT OF
UNOPPOSED MOTION TO
EXTEND CASE DEADLINES**

I, Robert E. Sabido, hereby declare:

1. I am one of the attorneys representing defendants Davis Law Firm and First National Bank of Omaha in this case.

2. The parties had a judicial settlement conference with Magistrate Judge Mark Clarke last month, but were not able to reach a settlement.

3. Since then, the parties have begun engaging in written discovery. And they anticipate scheduling depositions in the near future.

4. In the meantime, my firm will also be assuming the defense of DKC Investments, LLC in this case shortly. The details of that arrangement were being worked out over the last few weeks, and have been finalized only recently. A substitution of counsel for DKC will be filed early next week.

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MOTION TO EXTEND CASE DEADLINES**

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5. To allow the transition of DKC's defense to my firm to be finalized, and for the parties to continue and complete ongoing discovery, defendants request that the court extend all case deadlines by 60-days including (a) the discovery deadline (currently April 11, 2011); (b) pretrial, discovery and dispositive motions (currently April 11, 2011); and (c) joint ADR and pretrial order (currently May 9, 2011).

6. I have conferred with plaintiff and DKC's current counsel regarding this extension request. Neither of them objects.

7. This motion is made in good faith and not for any improper purpose.

**I DECLARE UNDER PENALTY OF PERJURY THAT THIS DECLARATION IS
TRUE AND CORRECT.**

DATED: March 11, 2011

/s/ Robert E. Sabido

Robert E. Sabido

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing

DECLARATION OF ROBERT E. SABIDO IN SUPPORT OF UNOPPOSED MOTION

TO EXTEND CASE DEADLINES on the date indicated below by:

- ☒ mail with postage prepaid, deposited in the US mail at Portland, Oregon,
- ☐ hand delivery,
- ☐ facsimile transmission,
- ☐ overnight delivery,
- ☒ electronic filing notification;

I further certify that said copy was placed in a sealed envelope delivered as indicated above and addressed to said attorney(s) at the address(es) listed below:

Lawrence James Saccato
c/o 6387 Old 99 S.
Roseburg, OR 97471
Plaintiff *pro se*

Jeffrey Hasson
Davenport & Hasson, LLP
12707 NE Halsey Street
Portland, OR 97230
Attorney for Defendant DKC Investments LLC

DATED: March 11, 2010

/s/ Robert E. Sabido
Robert E. Sabido